

4

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case: 2:20-cr-20123  
Judge: Drain, Gershwin A.  
MJ: Patti, Anthony P.  
Filed: 02-27-2020 At 03:02 PM  
USA V SEALED MATTER (LG)

VIOLATION: 21 U.S.C. § 841

D-1 SAMER YOUSIF JIRJESE

Defendant.

\_\_\_\_\_ /

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE: (Possession With Intent to Distribute Methamphetamine – 21  
U.S.C. § 841(a)(1))**

D-1 SAMER YOUSIF JIRJESE

On or about June 3, 2019, in the Eastern District of Michigan, Southern Division, defendant SAMER YOUSIF JIRJISE did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance;

All in violation of Title 21, United States Code, Section 841(a)(1).

## **FORFEITURE ALLEGATIONS**

### **Criminal Forfeiture - 21 U.S.C. § 853, 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c)**

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Pursuant to Title 21, United States Code, Section 853, upon conviction of any offense in violation of Title 21 set forth in this Indictment, the convicted defendant shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offenses.

Upon conviction of any offense in violation of Title 18, United States Code, Sections 924 set forth in this Indictment, the convicted defendant shall forfeit to the United States any firearms and ammunition involved in or used in the knowing commission of the offense, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c).

The United States intends to seek a forfeiture money judgment against the defendant for the total value of assets obtained by the defendant in connection with the offense(s) of conviction.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), independently and as incorporated by Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson  
Grand Jury Foreperson

MATTHEW SCHNEIDER  
UNITED STATES ATTORNEY

s/ Julie Beck  
Julie Beck (P53291)  
Assistant United States Attorney  
Chief, Drug Task Force

s/ Timothy P. McDonald  
Timothy P. McDonald (P64562)  
Assistant United States Attorney

Dated: February 27, 2020

United States District Court  
Eastern District of Michigan

**Criminal Case Cover**

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>TPM</i>

Case Title: USA v. Samer Jirjese

County where offense occurred : Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.  
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

February 27, 2020  
Date

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 Timothy P. McDonald  
 Assistant United States Attorney  
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 Attorney Bar #: P64562

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.